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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE APPLICATION OF SOUTHERN SUNRISE WATER COMPANY INC., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WATER RATES AND CHARGES FOR UTILITY SERVICE BASED THEREON.

DOCKET NO: W-20454A-09-0413

Ada da Corpora la Commission Date in ED

DOCKETED BY

Southern Sunrise Water Company Inc. ("SSWC") hereby files this Motion to Consolidate the above-captioned matter with the rate case applications filed by Bella Vista Water Co., Inc. ("BVWC") in Docket No. W-02465A-09-0411 and Northern Sunrise Water Company Inc. ("NSWC") in Docket No. W-20453A-09-0412, as well as the Joint Application filed by BVWC, NSWC and SSWC in Docket No. W-02465A-09-0414 (the "Joint Application").

BVWC, NSWC and SSWC are all affiliated companies owned by Algonquin Water Resources of America, Inc. ("Algonquin"). In addition to filing separate individual rate cases, BVWC, NSWC and SSWC have also filed a Joint Application to request that the Arizona Corporation Commission ("Commission") approve a consolidation of the companies' operations and their rates. By approving this Motion to Consolidate, the Commission can consider SSWC's request for rate consolidation, and consider the benefits of consolidation on all potentially affected water customers against the rate

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impact if all three rate structures otherwise remain separate. Notably, however, consolidation will not preclude a decision not to consolidate the three water providers as each rate case application contains all of the required testimony and supporting schedules upon which each individual company's rate can be set. Because consolidating the four applications will promote judicial economy and administrative efficiency, granting the Motion to Consolidate is in the public interest.

RELIEF REQUESTED

WHEREFORE, SSWC respectfully requests the following:

- 1. That the Commission proceed to consider and act upon this Motion as timely as possible by entering an Order approving the Motion, and
 - 2. Grant any other such relief as the Commission deems appropriate.

RESPECTFULLY SUBMITTED this 1st day of September, 2009.

FENNEMORE CRAIG, P.C.

By

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ORIGINAL and thirteen (13) copies of the foregoing were filed this 1st day of September, 2009 to:

Docket Control Arizona Corporation Commission 1200 W. Washington St. Phoenix, AZ 85007

By: Maira In fore

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